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May 21, 2013

Kevin Fortkiewicz Campaign Finance Analyst Federal Election Commission 999 E St., NW Washington, DC 20463

ID Number: C00499020

Reference: Amended 30 Day Post-General Report (10/18/12-11/26/12), received 1/31/13

Dear Mr. Fortkiewicz:

This letter is in response to your request for additional information, dated April 16, 2013.

- 1. All negative entries listed on Line 11(a)(i) were chargebacks, not refunds. They were recorded as negative receipts.
- 2. Your letter indicates that the Committee may have failed to file and timely file one or more of the required 24 hour reports for independent expenditures:

#### Missing Notices:

Adcoprint 10/20/12 \$21817.30: This 24 hour report was filed 10/21/12, however, the candidate was noted as Connie Mack, not Barack Obama. This was corrected on the Post General Filing.

Freedomworks 10/31/12 \$119.51: The Committee files estimated salary and overhead amounts on 48 hour/24 hour notices, then files any adjustment necessary at the end of every month.

Connection Strategy 10/31/12 \$40.95: The Committee received the invoice after the IE filing and was unaware of the charge at the time that it occurred. The Committee reported this on the monthly filing because it had missed the 24 hour report.

AOL 10/22/12 \$7545.45-Donnelly and 10/22/12 \$7545.45-Murdock: The Committee inadvertently neglected to include these on

a 24 hour notice. The Committee reported these on the Post-General Report because it was too late to report with a 24 hour notice.

Connection Strategy 10/31/12 \$37.54: The Committee received the invoice after the IE filing and was unaware of the charge at the time that it occurred. The Committee reported this on the monthly filing because it had missed the 24 hour report.

Freedomworks 10/31/12 10.06: The Committee files estimated salary and overhead amounts on 48 hour/24 hour notices, then

files any adjustment necessary at the end of every month.

AOL 10/22/12 \$4133.73-Nelson and 10/22/12 \$4133.73-Mack: The Committee inadvertently neglected to include these on a 24

hour notice. The Committee reported these on the Post-General Report because it was too late to report with a 24 hour notice.

Connection Strategy 10/31/12 36.76: The Committee received the invoice after the IE filing and was unaware of the charge at the time that it occurred. The Committee reported this on the monthly filing because it had missed the 24 hour report.

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Freedomworks 10/31/12 31.07: The Committee files estimated salary and overhead amounts on 48 hour/24 hour notices, then

files any adjustment necessary at the end of every month.

Freedomworks 10/31/12 \$88.19: The Committee files estimated salary and overhead amounts on 48 hour/24 hour notices, then files any adjustment necessary at the end of every month.

Political Gravity 11/1/12 \$900: The threshold of \$1000 was not met, so a 24 hour notice was not filed.

Connection Strategy 10/31/12 110.33; 37.67; 37.67 (same item listed twice); 116.10: The Committee received the invoice after the IE filing and was unaware of the charge at the time that it occurred. The Committee reported this on the monthly filing because it had missed the 24 hour report.

Freedomworks 10/18/13 \$3000: The Committee inadvertently neglected to include this on a 24 hour notice. The Committee reported this on the Post-General Report because it was too late to report with a 24 hour notice.

Freedomworks 10/22/13 \$235.16: The Committee inadvertently neglected to include these on a 24 hour notice. The Committee reported these on the Post-General Report because it was too late to report with a 24 hour notice.

Lowry's Printing 10/29/12 \$1088.11: This amount was originally reported as several payments to Joyce Linde, which were filed on timely 24 hour reports: 10/23/12 \$595.46; 10/23/12 \$47.64; 10/26/12 \$58.19 (corrected from 51.28); 10/29/12 \$47.48; 10/29/12 \$310.69 and 10/29/12 \$28.65. This was adjusted from Joyce Linde and reported correctly as a payment to Lowry's Printing.

Freedomworks 10/31/12 \$150.42: The Committee files estimated salary and overhead amounts on 48 hour/24 hour notices, then files any adjustment necessary at the end of every month.

Freedomworks 10/18/12 \$3000: The Committee inadvertently neglected to include this on a 24 hour notice. The Committee reported this on the Post-General Report because it was too late to report with a 24 hour notice.

Harris Media 10/28/12 \$18415.52: The Committee inadvertently neglected to include this on a 24 hour notice. The Committee reported this on the Post-General Report because it was too late to report with a 24 hour notice.

Connection Strategy 10/31/12 \$54.59: The Committee received the invoice after the IE filing and was unaware of the charge at the time that it occurred. The Committee reported this on the monthly filing because it had missed the 24 hour report.

Freedomworks 10/18/12 \$676.98: The Committee inadvertently neglected to include this on a 24 hour notice. The Committee

reported this on the Post-General Report because it was too late to report with a 24 hour notice.

AOL 10/22/12 7176.67: The Committee inadvertently neglected to include this on a 24 hour notice. The Committee reported this on the Post-General Report because it was too late to report with a 24 hour notice.

Freedomworks 10/23/12 971.90: The Committee inadvertently neglected to include this on a 24 hour notice. The Committee

reported this on the Post-General Report because it was too late to report with a 24 hour notice.

Harris Media 10/28/12 \$30,510.77 and \$450.72: The Committee inadvertently neglected to include this on a 24 hour notice. The Committee reported this on the Post-General Report because it was too late to report with a 24 hour notice.

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Mungo LLC 10/26/12 578.50: The Committee received the invoice after the IE filing and was unaware of the charge at the time that it occurred. The Committee reported this on the monthly filing because it had missed the 24 hour report.

AOL 10/29/12 \$14500: The Committee inadvertently neglected to include this on a 24 hour notice. The Committee reported this on the Post-General Report because it was too late to report with a 24 hour notice.

Freedomworks 10/31/12 \$61.35: The Committee files estimated salary and overhead amounts on 48 hour/24 hour notices, then

files any adjustment necessary at the end of every month.

AOL 10/22/12 \$7176.67: The Committee inadvertently neglected to include this on a 24 hour notice. The Committee reported this on the Post-General Report because it was too late to report with a 24 hour notice.

Freedomworks 10/31/12 \$91.36: The Committee files estimated salary and overhead amounts on 48 hour/24 hour notices, then files any adjustment necessary at the end of every month.

AOL 10/22/12 \$14,500: The Committee inadvertently neglected to include this on a 24 hour notice. The Committee reported this on the Post-General Report because it was too late to report with a 24 hour notice.

Connection Strategy 10/31/12 \$39.77: The Committee received the invoice after the IE filing and was unaware of the charge at the time that it occurred. The Committee reported this on the monthly filing because it had missed the 24 hour report.

Freedomworks 10/31/12 \$13.83: The Committee files estimated salary and overhead amounts on 48 hour/24 hour notices, then

files any adjustment necessary at the end of every month.

#### Late 24 Hour Notices:

Imagine This Company 10/27/12 \$3300; 10/27/12 \$6735; 10/27/12 \$1250; 10/27/12 \$5100: The Committee received the invoices on 10/31/12 and filed the 24 hour notices on 11/2/12.

Connection Strategy 10/24/12 \$657.01; 10/31/12 \$782.78; 10/31/12 \$608.18: The Committee received the invoices late and filed the 24 hour notices as soon as the information was received.

Freedomworks 11/4/12 \$1036.36: The Committee received the invoice last and filed the 24 hour notice as soon as the information was received.

Giovannis Pizza 10/18 12 \$68.93 and WaWa 10/18/12 \$13.74: The Committee received the receipts on 10/24/12 and filed the

24 notices on 10/25/12.

Freedomworks 12/24/12 \$28: The Committee files estimated salary and overhead amounts on 48 hour/24 hour notices, then files any adjustment necessary at the end of every month.

Arena Communications 10/29/12 \$24,824: The dissemination date was 10/29/12 and this was reported on a 24 hour notice on

10/30/12. This was filed on time. The notice filed on 10/31/12 for this same amount should have had a dissemination date of 10/30/12. This was corrected on the Post-General amendment filed 1/31/13.

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The Committee notes that is filed hundreds of 24 and 48 notices of independent expenditures accurately and on time. The above list is a small percentage of the overall number of notices filed.

- 3. Adcoprint 10/20/12 \$21817.30: This 24 hour report was filed 10/21/12, however, the candidate was incorrectly noted as Connie Mack, not Barack Obama. This was corrected on the Post General Filing.
- 4. The above referenced report has been amended to include all missing information.
- 5. The above referenced report has been amended to correct this information.
- 6. The above referenced report has been amended to disclose contributions from Political Committee on line 11c.

Sincerely,

R. Russ Walker